

TNC Comments on RMG/General Iron Expansion on Southeast Side

Susan Donovan <sdonovan@TNC.ORG>

Wed 1/13/2021 2:23 PM

To: envcomments <envcomments@cityofchicago.org>

 1 attachments (150 KB)

RMG General Iron comment 1.13.20 FINAL.docx;

[Warning: External email]

1/13/2021

To Whom It May Concern:

On behalf of The Nature Conservancy Illinois I am submitting the attached comment on the proposed expansion of RMG/General Iron on the Southeast Side. I appreciate the opportunity and your consideration of the comment.

Best,

Susan Donovan

Susan Donovan
*Director of Government
Relations*
sdonovan@tnc.org
773-490-2731

**The Nature Conservancy
Illinois**



nature.org

We're moving! As of May 18, our Chicago office will be located in the historic Wrigley Building.

Please note our new address at 400 N. Michigan Avenue, Suite S1100, Chicago, IL 60611. Phone numbers will remain unchanged.



The Nature Conservancy
Illinois Chapter
400 N. Michigan Avenue, Ste. 51100
Chicago, IL 60611

tel (312) 580-2100
e-mail: Illinois@tnc.org
nature.org/illinois

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10/20

Chicago Dept. of Public Health
333 S. State Street, Room 200
Chicago, IL 60604

January 13, 2021

RE: Comments on General III, LLC Large Recycling Facility Application

To Whom It May Concern:

Thank you for the opportunity to comment on the request by General III, LLC's ("GIII") for a Class IVB Large Recycling Facility permit, proposed for their property at 11600 S. Burley Avenue in Chicago. The Nature Conservancy is committed to conserving the resources for sustaining life on Earth, and we are called to take particular care where communities already carry a heavy environmental burden. From our science-based analyses and experience with the communities of the Calumet River, we urge the Department to reject this permit application.

The Conservancy bases our determination in part on our evaluation of community vulnerability to impacts related to climate change. Our analysis, called the [Chicago Greenprint](#), identifies all communities along the Calumet River (from Lake Michigan to Lake Calumet) as having especially high vulnerability to poor air quality. This matter is well-documented, given the many environmental justice issues local activists have raised in the Southeast Side. Our analysis utilizes publicly accessible data from government sources related to air quality, filtering the results by U.S. Census data on income and concentration of youth with high vulnerability.

One of the Conservancy's partnerships on the Southeast Side works with community volunteers, including families with young children, to engage them in stewardship of the valuable natural areas at Chicago Park District sites such as Big Marsh and Indian Ridge Marsh. Among our goals are to foster the many health benefits of engagement with nature and the outdoors in participants. However, these sites are within one mile of the proposed GIII facility. We also have helped to fund restoration programs at Eggers Grove Forest Preserve and William Powers State Recreation Area, both of which are similarly close and generally downwind of the proposed facility.

The Conservancy has a history of investment in Southeast Side natural areas and communities. Since 2015, we have led a coalition that has brought federal funding to restore habitat at the parks mentioned above totaling over \$875,000. These investments have had a significant impact on improving the quality of



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green spaces for local residents. Additional air pollution from the proposed GIII operation would only build on the existing risk demonstrated by our analyses, leading to concerns about the ongoing risk to the people working to manage and maintain these spaces for the community.

We are concerned that awarding the permit to GIII will jeopardize community residents seeking to improve their health at these important local natural areas, adding new risks to a community that is already overburdened with industrial air quality issues.

We appreciate and support the Department’s deficiency letter to GIII from December 23, 2021. However, the issues with the permit application go well beyond the gaps in the information supplied by GIII. It is clear from many data sources, including our own, that the 11600 Burley Ave. location – and the Southeast Side in general – is an inappropriate location for a large recycling facility. We encourage the Department to deny this permit.

Thank you.

Sincerely,

Susan Donovan, Dir. of Government Relations
SDONOVAN@TNC.ORG | (312) 580-2100